

Appln No. 09/692,829

Amdt date October 7, 2005

Reply to Office action of April 8, 2005

REMARKS/ARGUMENTS

Applicants thank the Examiner for his careful consideration of this application, and respectfully request reconsideration, reexamination and allowance of the application in view of the following remarks and amendments. Applicants have amended claims 1, 19, 36, 50, 59, 64, 70, 75, 91, 93, 95 and 97. Applicants have not canceled any claims or added any new claims. Claims 1-73 and 75-98 are pending.

I. Information Disclosure Statements

The Examiner has indicated that he believes that there is nothing for him to sign in regard to the March 12, 2002 Information Disclosure Statement (IDS) submitted by the Applicants. However, the IDS mailed March 12, 2002 included a form PTO/SB/08/A/B, which is to be signed and dated by the Examiner at the bottom of the page, then a copy of this signed document is returned to the Applicants, just as the Examiner has done with the first page of the form submitted with the IDS on September 27, 2004 that accompanied the present Office action.

In addition, Applicants note that the Examiner has apparently not returned an initialed copy of sheets 2-4 from the form PTO/SB/08/A/B filed with Applicants' IDS on September 27, 2004. As discussed above, only the first sheet has been signed and a copy returned. If the Examiner requires a further copy of either of these IDS forms, Applicants' respectfully request that the Examiner contact Applicants' undersigned counsel of record.

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II. Claims Rejected under 35 U.S.C. Section 112

The Examiner has rejected claims 1-18 under 35 U.S.C. Section 112, first paragraph as allegedly failing to comply with the written description requirement. The Examiner states that the Applicants' specification does not disclose the use of smart cards to restrict access to certain graphical interfaces based upon predetermined authorization levels. Applicants respectfully disagree.

Applicants point the Examiner to page 37, lines 1-6 of the Specification, which provide an example of the smart card being used to control access to an application. This section in combination with the discussion on page 16, lines 5-10, demonstrates that the smart cards may be used alone or in combination to restrict access to applications including graphical user interfaces. Accordingly, reconsideration and withdrawal of the written description requirement rejection of claims 1-18 are requested.

III. Claims Rejected under 35 U.S.C. Section 103

The Examiner has rejected claims 1-7, 9-25, 27, 30-39, 41, 44-51, 53, 55-70, 73 and 91-96 under 35 U.S.C. Section 103(a) as allegedly being unpatentable over Lewis et al, U.S. Patent 6,233,565 ("Lewis") in view of Hayes, Jr., U.S. Patent 6,105,063 ("Hayes") and in view of Gupta et al., U.S. Patent 6,226,752 ("Gupta").

To establish a *prima facie* case of obviousness, the Examiner must show that the cited references, combined, teach or suggest each of the elements of a claim. In regard to

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independent claim 1, this claim includes "a plurality of cryptographic devices for managing data from a plurality of postal security devices." The other independent claims, namely claims 19, 36, 50, 59, 64, 70, 75, 91, 93, 95 and 97, contain similar or identical limitations.

The noted limitations, in combination with the other features of the claims, do not appear to be disclosed in Lewis, Hayes or Gupta. Lewis appears to teach a system with a single server side cryptographic module that handles all transactions for all of the postal security devices. See Lewis, col 24, line 53 - col. 25 line 40. Thus, Lewis does not teach a system that has "a plurality of cryptographic modules" as recited in each of the independent claims. Lewis does not disclose a system capable of sharing postal security device data amongst multiple cryptographic modules. Therefore, Lewis does not teach or suggest each of the elements of the independent claims.

The Examiner has not indicated and the Applicants have been unable to discern any part of Hayes or Gupta that cures these defects of Lewis. The systems of Hayes and Gupta are not related to the handling of postal security device data. Accordingly, even assuming some motivation to combine the references, the proposed combination of references fails to teach or suggest each of the elements of the independent claims. Accordingly, reconsideration and withdrawal of the obviousness rejection of these claims are requested.

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In regard to the remaining claims, each of these claims depends from the independent claims discussed above and incorporates the limitations thereof, in addition to other limitations, which together further patentably distinguish these claims over the cited references. Thus, at least for the reasons set forth in regard to the independent claims, Lewis in view of Hayes and Gupta do not teach or suggest each of the elements of the dependent claims. Accordingly, reconsideration and withdrawal of the obviousness rejection of these claims are requested.

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CONCLUSION

In view of the foregoing amendments and remarks, it is believed that all claims now pending, namely claims 1-73 and 75-98, patentably define the subject invention over the prior art of record and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward toward allowance, the Examiner is encouraged to contact the undersigned at (626) 795-9900.

Respectfully submitted,
CHRISTIE, PARKER & HALE, LLP

By


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626/795-9900

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